

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION

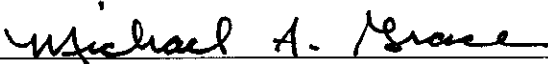
UNITED STATES OF AMERICA :  
 :  
 v. : **5:05CR00229**  
 :  
 CLIFFORD EUGENE WATKINS :  
 Defendant. :

**MOTION TO SEAL MOTION TO CONTINUE SENTENCING**

NOW COMES the Defendant, by and through his undersigned counsel, and moves the Court to file the previously submitted MOTION TO CONTINUE SENTENCING in this matter under Seal and in support of same shows unto the Court the following:

1. That the reason for the Motion to Continue is the Defendant's assistance with ongoing federal investigations.
2. That if the Motion is not filed under seal it may jeopardize both the Defendant's safety and the integrity of federal law enforcement's investigations.

This the 2<sup>nd</sup> day of March, 2006.

  
\_\_\_\_\_  
Michael A. Grace  
Attorney for Defendant  
North Carolina State Bar Number: 7758

GRACE HOLTON TISDALE & CLIFTON, P.A.  
301 N Main Street, Suite 100  
Winston-Salem NC 27101  
Telephone: (336) 725-9428

UNITED STATES DISTRICT COURT  
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UNITED STATES OF AMERICA :  
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 v. : **5:05CR00229**  
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 CLIFFORD EUGENE WATKINS :  
 Defendant. :

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that a copy of the foregoing **MOTION TO SEAL MOTION TO CONTINUE SENTENCING** was served on opposing counsel by placing a copy of same in the United States Mail, with adequate postage affixed thereto and addressed to the following individual:

Gretchen Shappert  
United States Attorney  
Suite 1700, Carillon Building  
227 W Trade ST  
Charlotte, NC 28202

This the 2<sup>nd</sup> day of March, 2006.



Michael A. Grace  
Attorney for Defendant  
North Carolina State Bar Number: 7758

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UNITED STATES OF AMERICA	:	
	:	
v.	:	<b>5:05CR00229</b>
	:	
CLIFFORD EUGENE WATKINS	:	
Defendant.	:	


MOTION TO CONTINUE SENTENCING

NOW COMES the Defendant, by and through his undersigned counsel, and moves the Court to enter an Order continuing the sentencing in the above-captioned matter; and in support of same shows unto the Court the following:

1. The Sentencing Hearing in this matter is scheduled for March 6, 2006.
2. The Defendant has been interviewed by the Government consistent with Rule 5K of the Federal Sentencing Guidelines and was well received by the Government.
3. The Defendant's has been proactive in his dealings with the Government in pursuit of consideration under Rule 5K
4. That the Defendant needs additional time in which to conclude his pursuit of consideration under Rule 5K.
5. That counsel for Defendant has conferred with U.S. Attorney Gretchen Shappert who is handling this matter. Ms. Shappert is scheduled to be in trial the week of March 6, 2006 and does not oppose this motion for a continuance.

WHEREFORE, and based on the foregoing, the Defendant, through counsel,  
prays the Court enter an Order allowing a continuance in the sentencing of Defendant.

Respectfully submitted, this the 2<sup>nd</sup> day of March, 2006.



Michael A. Grace  
Attorney for Defendant  
North Carolina State Bar Number: 7758

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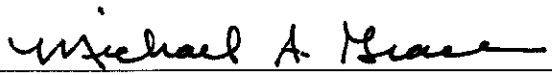
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This the 2<sup>nd</sup> day of March, 2006.

  
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Michael A. Grace  
Attorney for Defendant  
North Carolina State Bar Number: 7758

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